



**MEMO ENDORSED**

Myers & Galiardo, LLP | 52 Duane Street, 7Fl., New York, NY 10007 | 212-986-5900 | www.citylaw.nyc

Magistrate Judge Reznik  
Federal Building and US Courthouse  
300 Quarropas St.  
White Plains, NY 10601-4150

October 2, 2023

Re: United States v. Omar Chafei  
22 MAG 7294 (PED)

Your Honor:

This letter is to request modifications to the conditions of bond giving the defendant permission to travel for employment purposes without seeking the Court's permission for each employment travel obligation.

The defendant requests permission to travel from his residence in South Bend, Indiana to transport vehicles to different regions of the USA. He has a signed contract with Acertus, Inc to conduct said business.

Mr. Chafei is college educated with two degrees but has nevertheless found employment very difficult to obtain. He is suffering financially and must take advantage of any employment opportunity he can obtain to support his family.

The Government has no objection to this application. The Defense asked Pre Trial Services to submit a letter stating the defendant is not a flight risk but the Indiana Pre Trial Office seemingly has a policy to not submit such letters although the New York Pre Trial Office has furnished such letters for my law office in the past. That said, Mr. Chafei has travelled several times from Indiana to New York to meet with counsel, as well as travelled to Dulles Airport in Washington, DC, and to Walt Disney World in Florida with his family, and to a business conference outside of South Bend, Indiana during the pendency of this case. Mr. Chafei is simply not a flight risk.

We remind the Court that Mr. Chafei does not have a criminal record and has had no violations while under the supervision of pre-trial services.

Thank-you for Your Honor's attention to this matter.

Respectfully,

Matthew D. Myers  
Attorney at Law

Cc: AUSA Steven Kochevar

N ♦ Y ♦ C

The Court grants defendant's request to modify his conditions of bond so that he may travel for employment purposes, subject to the ongoing supervision of Pretrial Services. Although Mr. Chafei need not seek Court permission for each employment travel obligation, he must notify and be in contact with Pretrial Services, as directed.

SO ORDERED.

Hon. Victoria Reznik, U.S.M.J.

10/3/2023